

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FILED ELECTRONICALLY

-----	x	
)	
CELTIC WOMAN LTD.,)	
)	
Plaintiff,)	
)	No 08-CV-0066 (TPG)
- against -)	
)	
CELTIC THUNDER LTD.,)	
CELTIC MAN LTD., SHARON)	
BROWNE, WLIW LLC,)	
ALIGN ENTERTAINMENT LLC)	
and GUSTAVO SAGASTUME)	
)	
Defendant.)	
-----	x	

DECLARATION OF TERREL CASS

1. I am President and General Manager of WLIW LLC ("WLIW"), also known as Channel 21, a public broadcasting station in the New York area. I make this declaration on personal knowledge, and in reliance on the business records of WLIW, in opposition to the plaintiff's motion for a preliminary injunction.

2. This lawsuit relates to "Celtic Thunder," a musical show featuring an all-male cast of Irish singers and produced by Sharon Browne. WLIW plans to broadcast a television show of "Celtic Thunder" in March 2008. I understand that plaintiff Celtic Woman Ltd. is asking the court to enjoin WLIW from referencing either CELTIC MAN or CELTIC WOMAN in association with the "Celtic Thunder" program.

3. The program to be broadcast on WLIW originally was to be called "Celtic Man in Celtic Thunder," but CELTIC MAN no longer is used in connection with the

show, including in the title or in any promotional materials for the show. The show is now known and promoted simply as “Celtic Thunder.”

4. Certain promotional materials for the WLIW show formerly referred to Sharon Browne as “the original creator of Celtic Woman.” Any reference to CELTIC WOMAN, including any reference to Ms. Browne as its “creator” has since been removed from the “Celtic Thunder” broadcast and from promotional materials for the broadcast, including from the WLIW website.

5. Special editions of the “Celtic Thunder” CD and DVD will be made available as gifts to WLIW viewers who make financial pledges in support of our public television station. The artwork for the CD and DVD will not have any references to either CELTIC MAN or CELTIC WOMAN. True and correct copies of this artwork are attached to this declaration as Exhibit A. This artwork will not be changed.

6. Going forward, WLIW will not incorporate references to CELTIC MAN or CELTIC WOMAN into the broadcast or promotional materials. The only exception is that in interviews or biographical materials, WLIW may carry incidental references to the fact that Ms. Browne or others involved with CELTIC THUNDER formerly were involved with CELTIC WOMAN.

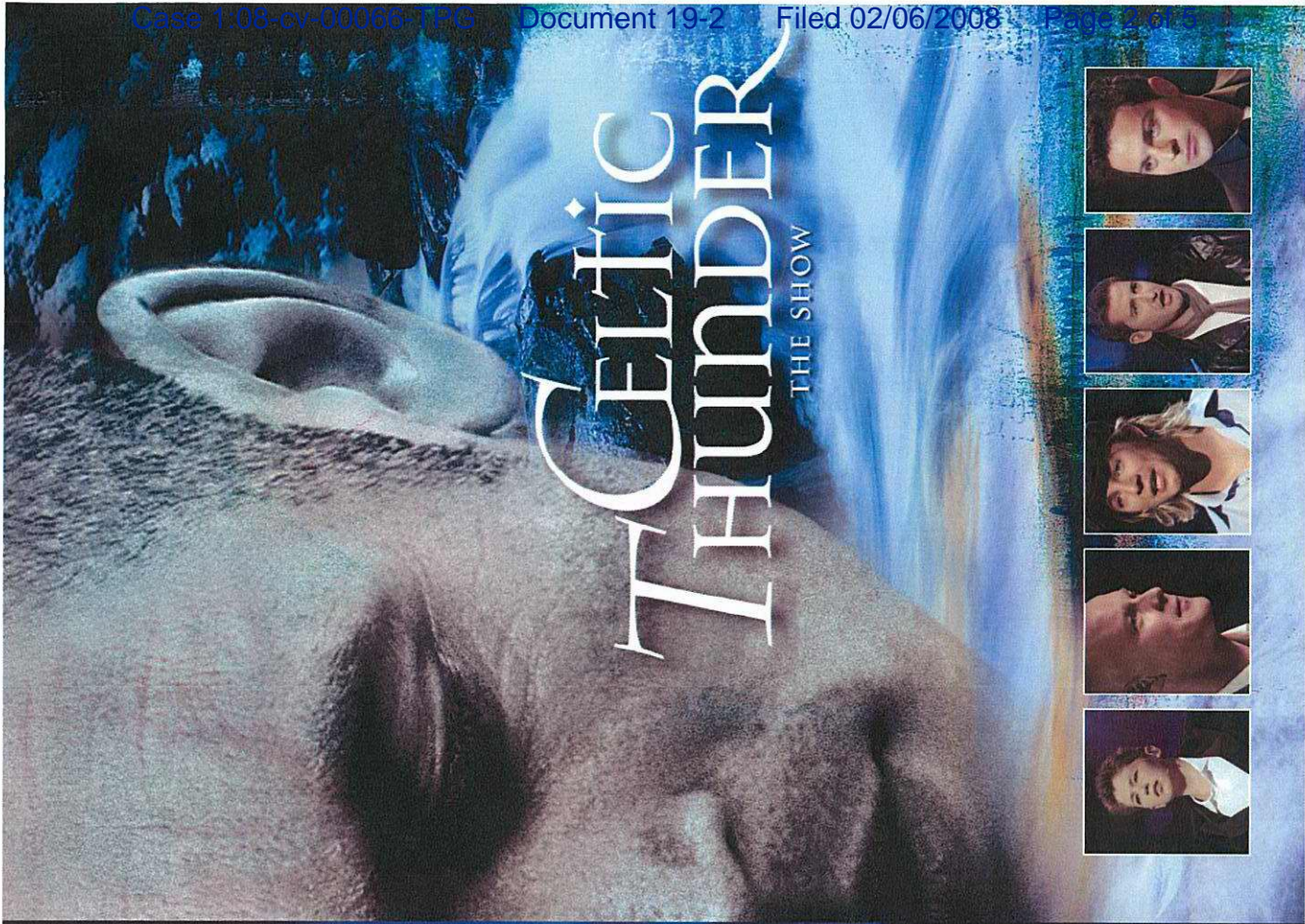
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I declare under penalty of perjury that the foregoing is true and correct.

Executed at PRAY, Montana this 6TH day of February, 2008.


Terrel Cass

Exhibit A



CELTIC THUNDER - THE SHOW

CTDVD 001P

Public Television Limited Edition
presented by
WLIW
New York

1. Heartland
2. Mountains of Mourne
3. Raggle Taggle Gypsy
4. Ride On
5. Come By The Hills (Buachaill ón Éirne)
6. The Old Man
7. Love Thee Dearest
8. Heartbreaker
9. Nights in White Satin
10. A Bird Without Wings
11. The Voyage
12. The Island
13. Brothers in Arms
14. Mull of Kintyre
15. Puppy Love
16. Lauren & I
17. Steal Away
18. Remember Me (Reicturadame)
19. My Boy
20. Desperado
21. Ireland's Call
22. That's a Woman
23. She
24. Young Love
25. I Want To Know What Love Is
26. Cal/Local Hero
27. Caledonia
- BONUS TRACKS**
28. Yesterday's Men
29. Christmas 1915



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DAMIAN



GEORGE



KEITH



PAUL



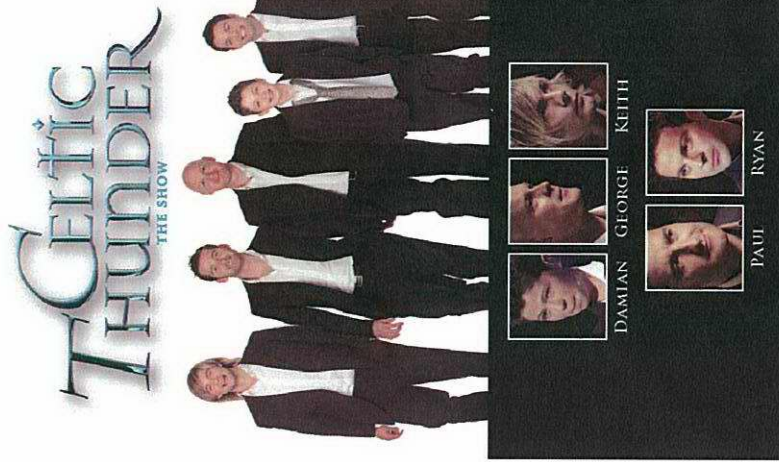
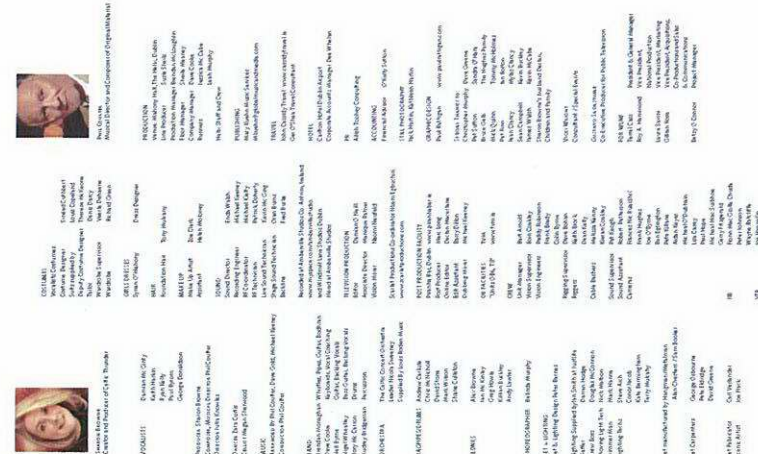
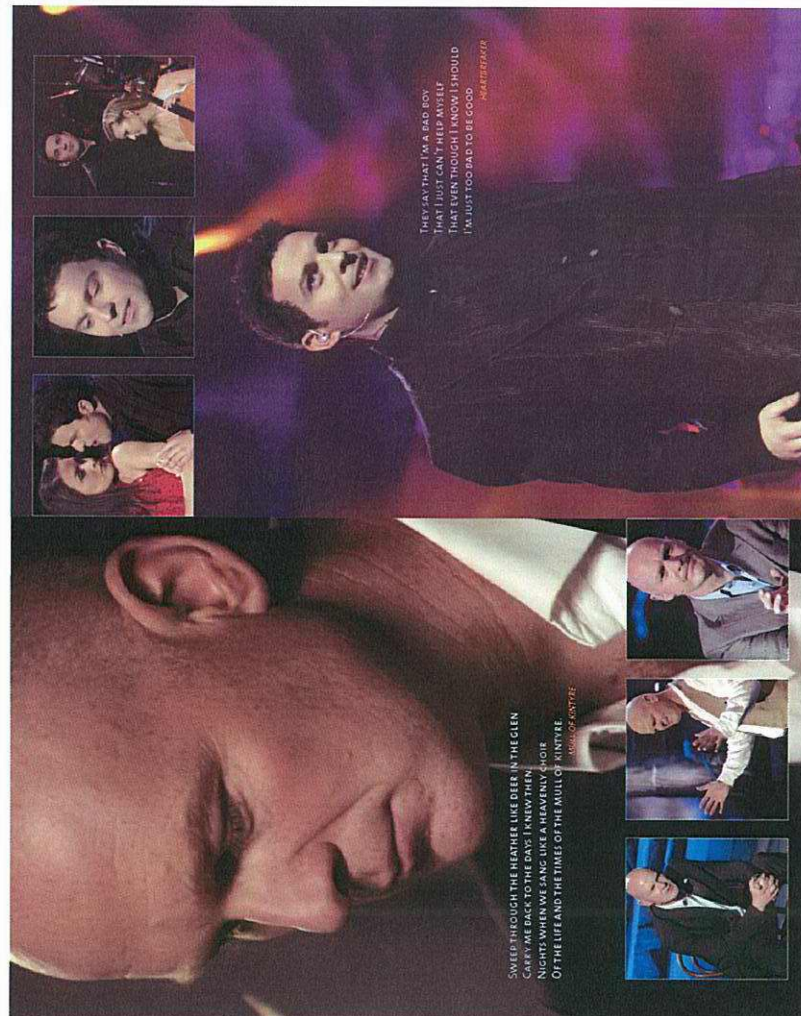
RYAN



THE CELTIC THUNDER

THE SHOW

HEARTLAND (Coulter) Celtic Thunder Ltd. Damian, George, Keith, Paul, Ryan	LAUREN & I (Harkin) Celtic Thunder Ltd. Keith
THE MOUNTAINS OF MOURNE (arr. Coulter) Celtic Thunder Ltd. Keith	STEAL AWAY (Coulter) Four Seasons Publishing (PRS) Damian, George, Keith, Paul, Ryan
RAGGLE TAGGLE GYPSY (arr. Coulter) Celtic Thunder Ltd. Damian, George, Keith, Paul, Ryan	REMEMBER ME (RECUERDAME) (Coulter) Four Seasons Publishing (PRS) Paul
RIDE ON (McCarthy) Universal-MCA Music Publishing Ryan	MY BOY (Boutayre/Francois/Dessca /Martin/Coulter) Colgems-EMI Music, Inc./EMI Music Publishing France SA/ CopyrightControl George
COME BY THE HILLS (BUACHAILL ÓN EIRNE) (arr. Coulter) Celtic Thunder Ltd. Damian	DESPERADO (Henley/Frey) Cross County Music / Red Cloud Music (BMI) Ryan
THE OLD MAN (Coulter) Four Seasons Publishing (PRS) George	IRELAND'S CALL (Coulter) Four Seasons Publishing (PRS) Damian, George, Keith, Paul, Ryan
LOVE THEE DEAREST (Music PD arr. Coulter/Italian lyric Grant Muskler & Kabalia) Celtic Thunder Ltd. Paul	THAT'S A WOMAN (Coulter) Celtic Thunder Ltd. Paul, Ryan
HEARTBREAKER (Coulter) Celtic Thunder Ltd. Ryan	SHE (Amour/Kretzner) Essex Music, Inc. (ASCAP) Paul
NIGHTS IN WHITE SATIN (Howard) Essex Music, Inc. (ASCAP) Paul	YOUNG LOVE (Carter/Loyner) Sony/ATV Songs LLC (BMI) Damian
A BIRD WITHOUT WINGS (Coulter/Chapman) Mike Chapman Publishing Enterprises (ASCAP) Four Seasons Publishing (PRS) Damian, George	I WANT TO KNOW WHAT LOVE IS (Jones) Somerset Songs Publishing, Inc. (ASCAP) Keith
THE VOYAGE (Duhann) Johnny Duhann Songs George	LOCAL HERO (Knopfler) Almo Music Corp d/b/o Charriscourt Ltd. (ASCAP) Orchestral
THE ISLAND (Beady) Sandford Song d/min. By Ten Tunes (ASCAP) Keith	CALEDONIA (arr. Coulter) Celtic Thunder Ltd. Damian, George, Keith, Paul, Ryan
BROTHERS IN ARMS (Knopfler) Almo Music Corp d/b/o Charriscourt Ltd. (ASCAP) Ryan	YESTERDAY'S MEN (Coulter/Martin) Four Seasons Publishing (PRS) George
MULL OF KINTYRE (arr. Coulter) Celtic Thunder Ltd. Damian, George, Keith, Paul, Ryan	CHRISTMAS 1915 (McConnell) Copyright Control Damian, George, Keith, Paul, Ryan
PUPPY LOVE (Anka) Chrysalis Standards, Inc. (BMI) Damian	





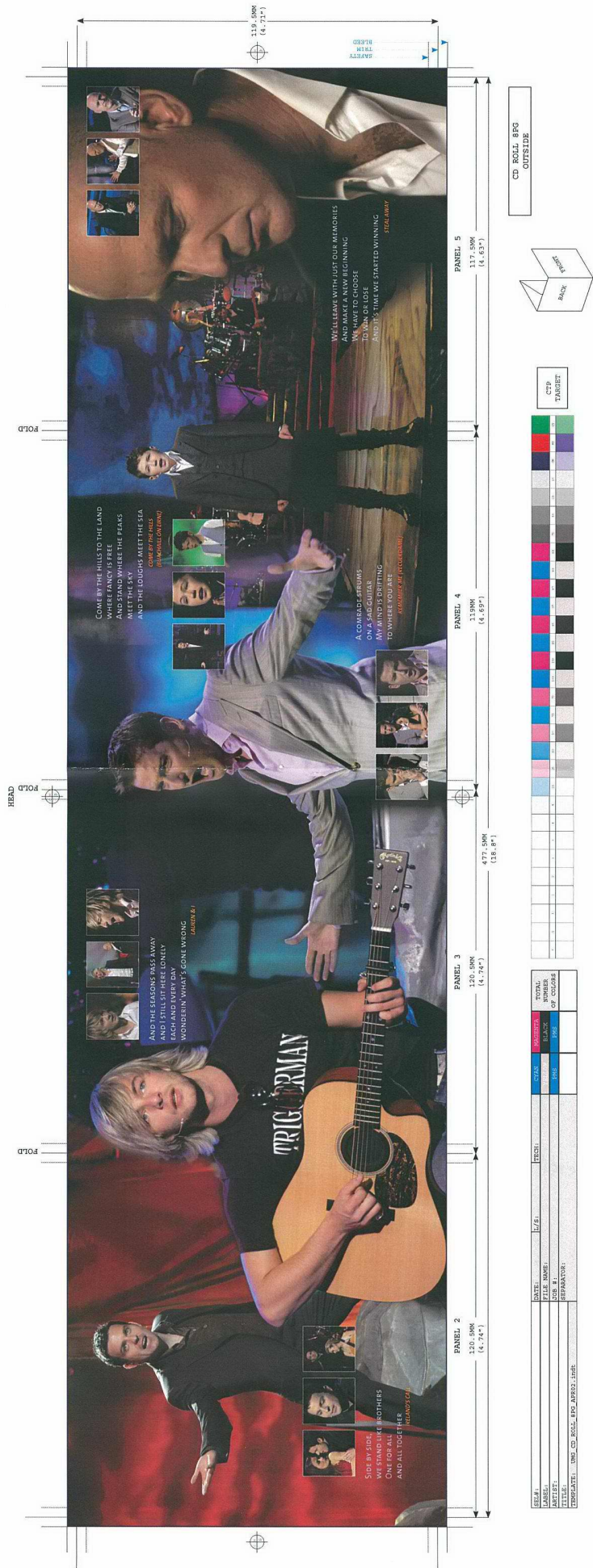
WOMAN: GO SLEEP AND BEGUILING
 SHE'S SMILING
 AND FEEL YOUR HEART AT AGLOW
 ENOUGH TO
 LAY HER HEAD ON YOUR SHOULDER
 AND HOLD HER
 "TELL YOU JUST CAN'T LET HER GO"
 THAT'S A WOMAN

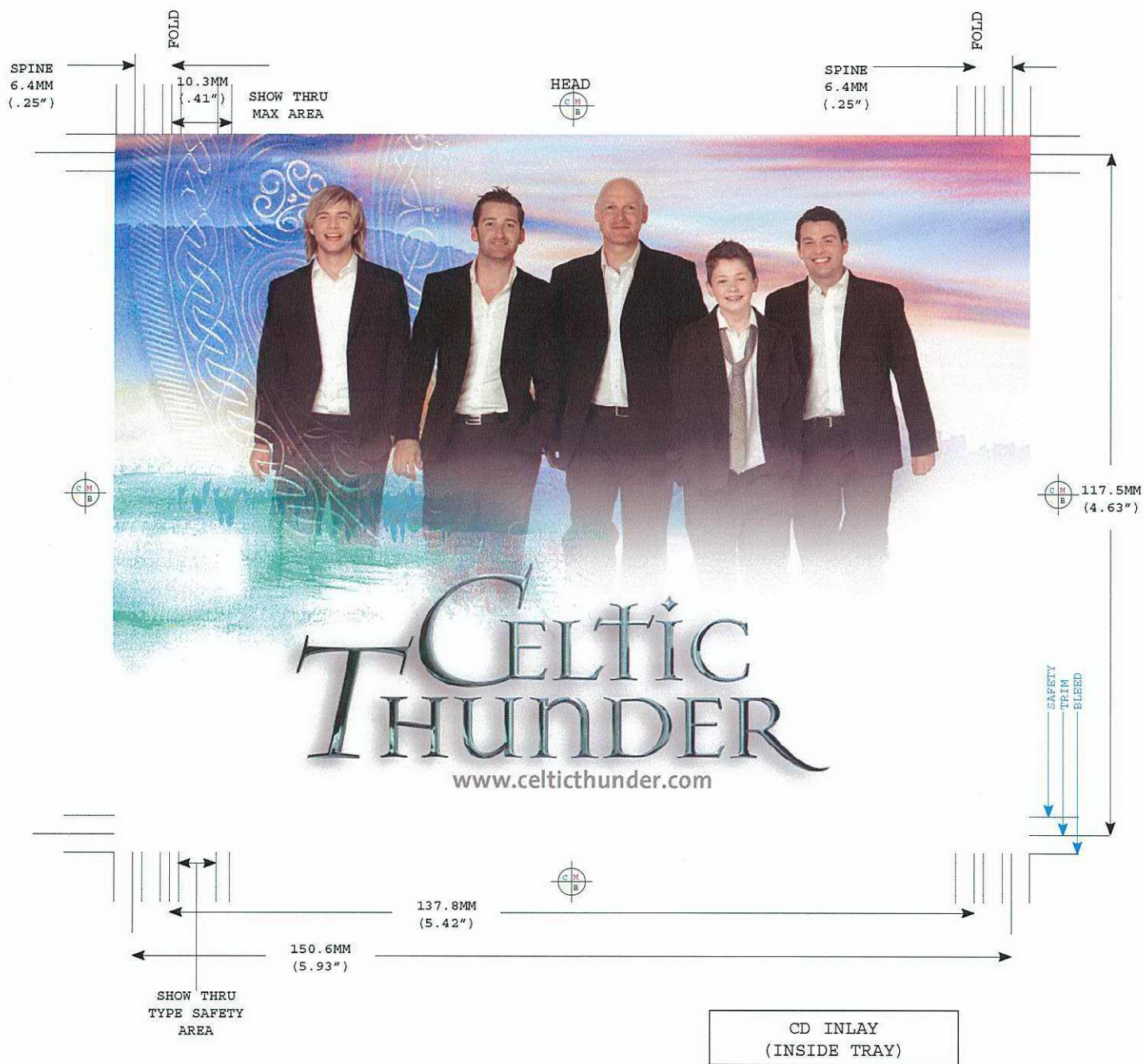
LIKE A BIRD WITHOUT WINGS
 THAT LONGS TO BE FLYING
 LIKE A MOTHERLESS CHILD
 LIKE A WOLF AND CRYING
 LIKE A LONELY AND CRYING
 LIKE A WORLD WITHOUT MUSIC
 I WOULDN'T KNOW WHAT TO DO
 I'D BE LOST WITHOUT YOU
 A BIRD WITHOUT WINGS

AND THE SEASONS FALL AWAY
 AND I STILL SIT HERE LONELY
 EACH AND EVERY DAY
 WONDER IN WHAT'S COME WRONG
 (ALBUM)



Exhibit A





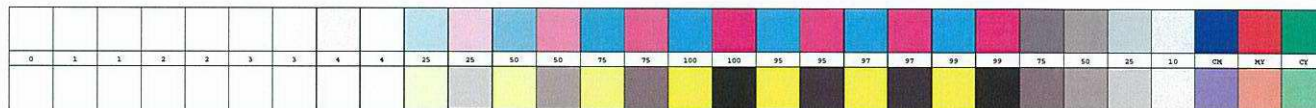
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ARTIST:	JOB #:			FM2	FM3	
TITLE:	SEPARATOR:					
TEMPLATE: UMG CD INLAY CLEAR NOV02.indt						

[illegible]CTP
TARGET



CD INLAY
(OUTSIDE TRAY)

SEL#:	DATE:	L/S:	TECH:	CYAN	MAGENTA	TOTAL
LABEL:	FILE NAME:			YELLOW	BLACK	NUMBER
ARTIST:	JOB #:			RGB	RGB	OF COLORS
TITLE:	SEPARATOR:					
TEMPLATE: UMG_CD_INLAY_NOV02.indt						



CTP
TARGET